

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>JOHNNY M. HUNT,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 3:23-cv-00243</b>
	)	
<b>SOUTHERN BAPTIST CONVENTION;</b>	)	<b>Judge Richardson</b>
<b>GUIDEPOST SOLUTIONS LLC; and</b>	)	<b>Magistrate Judge Frensley</b>
<b>EXECUTIVE COMMITTEE OF THE</b>	)	<b>Jury Demand</b>
<b>SOUTHERN BAPTIST CONVENTION,</b>	)	
	)	
<b>Defendants.</b>	)	

---

**CONSOLIDATED REPLY IN SUPPORT OF MOTION TO COMPEL AND RESPONSE  
TO MOTION FOR A PROTECTIVE ORDER AND IN CAMERA REVIEW**

---

Pursuant to Rule 7.01 of the Local Rules of Court, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, hereby respectfully submits his Consolidated Reply in Support of his Motion to Compel (ECF Doc. No. 57) and his Response in Opposition to the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) filed by Defendant Guidepost Solutions LLC (“Guidepost”).

As explained more fully in the accompanying Consolidated Memorandum in Support of his Reply in Support of Motion to Compel and Response in Opposition to Guidepost’s Motion for a Protective Order and *In Camera* Review, Plaintiff’s Motion to Compel should be granted in its entirety, and Guidepost’s Motion for a Protective Order and *In Camera* Review should be denied in its entirety. Guidepost has admitted to the responsiveness of the documents it is withholding from production to Plaintiff’s discovery requests; Guidepost’s belated objection to producing documents on the basis of its contractual commitment to the SBC is without merit and

has been waived; Guidepost previously committed to producing the documents it is now withholding from production; the documents Guidepost is withholding are key evidence in the case, particularly in light of the representations made by Guidepost in its Motion for a Protective Order and *In Camera* Review (and the filings related thereto); and, in any event, Guidepost has failed to carry its burden under Rule 26(c) of the Federal Rules of Civil Procedure to justify relief from its discovery obligations in this case. For these reasons, Plaintiff should also be awarded his reasonable expenses, including attorney's fees, incurred in making his Motion to Compel and responding to the Motion for a Protective Order and *In Camera* Review.

For the foregoing reasons, as well as the reasons set forth in the accompanying Consolidated Memorandum, this Court should grant the Motion to Compel (ECF Doc. No. 57) in its entirety and deny the Motion for a Protective Order and *In Camera* Review (ECF Doc. No. 61) in its entirety.

Dated: October 27, 2023

Respectfully submitted,

s/ Andrew Goldstein

---

**Todd G. Cole, Esq., BPR # 031078**

**Andrew Goldstein, Esq., BPR # 037042**

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 490-6020

Fax: (615) 942-5914

tcole@colelawgroupc.com

agoldstein@colelawgroupc.com

*-and-*

**Robert D. MacGill, Esq. (*pro hac vice*)**

**Scott E. Murray, Esq. (*pro hac vice*)**

**Patrick J. Sanders, Esq. (*pro hac vice*)**

MACGILL PC

156 E. Market St.

Suite 1200

Indianapolis, IN 46204

Telephone: (317) 721-1253

robert.macgill@macgilllaw.com

scott.murray@macgilllaw.com

patrick.sanders@macgilllaw.com

*Attorneys for Plaintiff*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Consolidated Reply in Support of Motion to Compel and Response to Motion for a Protective Order and *In Camera* Review has been served on October 27, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

E. Todd Presnell, Esq.  
Scarlett Singleton Nokes, Esq.  
R. Brandon Bundren, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37203  
snokes@bradley.com  
bbundren@bradley.com

Gene R. Besen, Esq.  
BRADLEY ARANT BOULT CUMMINGS LLP  
Fountain Place  
1445 Ross Avenue, Suite 3600  
Dallas, Texas 75202

Thomas J. Hurney, Jr., Esq.  
Gretchen M. Callas, Esq.  
JACKSON KELLY PLLC  
500 Lee Street East, Suite 1600  
Post Office Box 553  
Charleston, West Virginia 25322  
Telephone: 304-340-1000  
thurney@jacksonkelly.com  
gcallas@jacksonkelly.com

*Counsel for the Executive Committee of the  
Southern Baptist Convention*

John R. Jacobson, Esq.  
Katharine R. Klein, Esq.  
RILEY & JACOBSON, PLC  
1906 West End Avenue  
Nashville, Tennessee 37203  
jjacobson@rjfirm.com  
kklein@rjfirm.com

Steven G. Mintz, Esq.  
Terence W. McCormick, Esq.  
MINTZ & GOLD LLP  
600 Third Avenue, 25<sup>th</sup> Fl.  
New York, New York 10016  
mintz@mintzandgold.com  
mccormick@mintzandgold.com

*Counsel for Guidepost Solutions LLC*

L. Gino Marchetti, Jr., Esq.  
Matthew C. Pietsch, Esq.  
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC  
2908 Poston Avenue  
Nashville, Tennessee 37203  
gmarchetti@tpmblaw.com

*Counsel for the Southern Baptist Convention*

s/ Andrew Goldstein  
\_\_\_\_\_  
ANDREW GOLDSTEIN